



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

OFFICE OF
CHIEF COUNSEL

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The Honorable Max Baucus
United States Senate
Washington, D.C. 20510-2602

Dear Senator Baucus:

This letter is in response to your inquiry to Commissioner Rossotti dated May 2, 2000, on behalf of the [REDACTED]. You asked us to promptly review the rulings submitted to the Internal Revenue Service by the [REDACTED] in connection with its restructuring of the ownership of its electric generation facilities.

We have a number of cases involving complex issues about the ongoing restructuring of the electric utility industry. These cases present new issues for which determinations must be carefully made. However, we do appreciate your concerns and are working as rapidly as possible to make these determinations and to issue the requested rulings.

I hope this information is helpful. If you have any further questions, please contact me or Peter Friedman at (202) 622-3110.

Sincerely,

CHARLES B. RAMSEY
Chief, Branch 6
Office of Assistant Chief Counsel
Passthroughs and Special Industries